

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: November 20, 2024 at 2:00 p.m. (ET)

Objection Deadline: November 11, 2024 at 4:00 p.m. (ET)

Ref. Nos. 25718 & 25750

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
ONE HUNDRED NINETEENTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On September 25, 2024, the Debtors filed the *Debtors’ One Hundred Nineteenth (Non-Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims)* [D.I. 25718, redacted & 25750, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 25718-1 & 25750-1], any responses to the Objection were to be filed no later than November 11, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

3. The Debtors received informal responses (the “Informal Responses”) to the Objection from the holders of claim numbers 1901, 90884, 94491, 88577, 51497, 5741, 95965, 95770 and 88944.

4. On October 17, 2024, Gregory Declercq (“Declercq”) filed a response to the Objection [D.I. 26946] (the “Declercq Response”).

5. On November 5, 2024, Manik Jain (“Jain”) filed a response to the Objection [D.I. 27734] (the “Jain Response”).

6. On November 6, 2024, Michael Judkins (“Judkins”) filed a response to the Objection [D.I. 27726] (the “Judkins Response”).

7. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

8. The Debtors resolve the Informal Responses from the holders of claim numbers 88577, 51497 and 5741 without modification to the schedules attached to the proposed form of order.

9. The Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournments to the Objection solely with respect to the claims of Declercq, Jain and Judkins and claim numbers 1901, 90884, 94491, 95770, 95965 and 88944. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Official Committee of Unsecured Creditors (the “Committee”), and the Committee has no objection to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

10. Accordingly, the Debtors respectfully request that the Court enter the Revised

Order at its earliest convenience.

Dated: December 30, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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